Case 1:10-cv-04106-NJV Document 25 Filed 06/29/11 Page 1 of 3

1 2 3 4 5 6 7	John M. Vrieze, CSB #115397 William F. Mitchell, CSB #159831 MITCHELL, BRISSO, DELANEY & VRII Attorneys at Law 814 Seventh Street P. O. Drawer 1008 Eureka, CA 95502 Tel: (707) 443-5643 Fax: (707) 444-9586 Attorneys for Defendants STEVE MORRIS, JOSEPH GARCIA, GENE MCMANUS and MICHAEL RIESE		
8 9	LINITED STATES	S DISTRICT COLIRT	
10	UNITED STATES DISTRICT COURT		
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
12	EUREKA DIVISION KIRK STEWART, SUSAN STEWART, CASE NO.: CV 10-4106 NJV		
13	CAMERON STEWART and FRED		
14	OTREMBA,	JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE NON-EXPERT DISCOVERY CUT-OFF DATE	
15	Plaintiffs, vs.		
16			
17	STEVE MORRIS, SETH CIMINO, JOE GARCIA, GENE MCMANUS, MIKE		
18	RIESE, COUNTY OF DEL NORTE, and		
19	DOES 1-5,		
20	Defendants.		
21			
22			
23			
24			
25			
26			
MITCHELL, BRISSO, DELANEY & VRIEZE 814 Seventh Street P.O. Drawer 1008 Eureka, CA 95502		0	

JOINT STIPULATION TO CONTINUE EXPERT DISCOVERY CUT-OFF DATE

Case 1:10-cv-04106-NJV Document 25 Filed 06/29/11 Page 2 of 3

1	WHEREAS, pursuant to the Courts Case Management and Pretrial Order (Docket			
2	No. 21, filed December 21, 2011), the non-expert discovery cut-off Date is presently			
3	scheduled for July 15, 2011.			
4	WHEREAS, due to the various pending party witness depositions set by counsel is			
5	this case, more time is needed to coordinate the schedules of these witnesses and the			
6	respective schedules of plaintiffs' counsel and defense counsel.			
7	WHEREAS, plaintiffs' counsel and counsel for the defendants stipulate to a short			
8	continuance of the date to complete non-expert discovery from July 15, 2011 to August			
9	9 15, 2011.			
10	WHEREAS, there is no prejudice to the parties and there will be no disturbance of			
11	the currently scheduled May 14, 2012 trial date to this short continuance of the discovery			
12	cut-off for the purpose of completing the depositions of the parties.			
13	3			
14	4 IT IS SO STIPULATED:	IT IS SO STIPULATED:		
15	5			
16	6 DATED: May 25, 2011 MITCH	HELL, BRISSO, DELANEY & VRIEZE, LLP		
17		/s/ John M. Vrieze		
18	8	John M. Vrieze		
19	9	Attorneys for Defendants		
20	20 DATED: May 25, 2011 LAW 0	OFFICE OF KAREN D. OLSON		
21	By:	/s/ Karen D. Olson		
22	· ·	Karen D. Olson Attorneys for Plaintiffs		
23		Autoriteys for Flamuits		
24	24			
25	25			
26	26			
), E				

MITCHELL, BRISSO, DELANEY & VRIEZE 814 Seventh Street P.O. Drawer 1008 Eureka, CA 95502

MITCHELL, BRISSO, DELANEY & VRIEZE 814 Seventh Street P.O. Drawer 1008 Eureka, CA 95502

26